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CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

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153797

September 16, 1986

Ms. Anne Weinert
United States Environmental
Protection Agency, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Weinert:

A comprehensive wastewater characterization study at the Cerro facility was conducted in April of this year by Patterson Associates, Inc. As Dr. Patterson explained, this study included a seven day round the clock sampling program at 21 different points in the Cerro waste stream. In August, the final reports from the laboratories were received and these have yielded some 13,000 data points which Patterson Associates, Inc. is currently evaluating to provide much of the data requested in Attachment I to the July 29th letter from J. David Ranken.

The complexity of this study (identified as "Phase II") can be appreciated when consideration is given to the fact that the Cerro facility at Sauget is the only fully integrated copper plant in this country. It is more than 60 years old and its pattern of growth, expansion and modernization has resulted in a physical arrangement having many of the operations overlapping and interconnected rather than a straight line arrangement. This has resulted in a wastewater flow configuration that is extremely complex. The operations are subject to three different National Categorical Pretreatment Standards.

Most of the information requested in paragraph (1), Nature of Operation, in Attachment I, has been prepared and can be submitted by the end of this month. This would not include any flow data which would need to be derived from the Phase II study, and Dr. Patterson indicated that there should be sufficient information available by October 15 to provide the flow data.

Items (2) - Wastewater Flows and (3) Nature and Concentration of Pollutants require completion of the Phase II study to provide the information requested therein. At the present time we believe that

C07347

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Ms. Anne Weinert
September 16, 1986
Page 2

this will be available around the end of December of this year. Dr. Patterson has indicated that it would be possible to provide the information on wastewater flows several weeks in advance of the completion of the Phase II study. However, this would entail a considerable amount of extra work on his part and we would much prefer to submit both at the same time.

Compliance Certification, Item (4), would be provided along with Items (2) and (3) at the completion of the Phase II study.

Item (5), Compliance Schedule, is very difficult to determine at this time because it is totally contingent on the data that would be provided by the Phase II study. Under most optimistic circumstances it might be available 30 days after the completion of Phase II. On the other hand, if those results necessitate further engineering studies it would be a matter of several additional months before a reasonable compliance schedule could be derived.

Very truly yours,

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S. A. Silverstein
Manager of Energy and
Environmental Affairs

SAS/ge

bcc: P. Tandler —
R. Kissel
J. Patterson
File

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